

10



National Electrical Manufacturers Association

1300 North 17th Street, Suite 1752

Arlington, VA 22209

703-841-3200

Fax: 703-841-3300

**Testimony of the National Electrical Manufacturers Association
Before the Connecticut Joint Legislative Committee on
Public Safety & Security**

Re: HB 6524 – *Legislation Extending the State Building Code Adoption Review to a Six-Year Cycle*

March 18, 2013

POSITION: Oppose 6-Year Cycle Provision in HB 6524

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide testimony on Connecticut House Bill 6524, *Legislation Extending the State Building Code Adoption Review to a Six-Year Cycle*. NEMA is the principal trade association representing the interests of the US electrical and medical imaging manufacturing industry. These comments reflect the view of NEMA member companies that manufacture and supply electrical equipment required by the Connecticut State Building Code.

NEMA has 18 member companies who have facilities in the state of Connecticut. Those companies include:

- | | |
|---|--------------------------------------|
| • Acuity Brands Lighting | • Legrand, North America |
| • Bridgeport Fittings, Inc. | • Light Sources Inc. |
| • Cummins, Inc. | • The Valley Group, a Nexans Company |
| • Duracell, Inc. | • Philips Electronics North America |
| • Edwards A UTC Fire & Security Company | • Rea Magnet Wire Company, Inc. |
| • Evax Systems, Inc. | • RSCC Wire & Cable Group |
| • Honeywell Fire-Lite/Notifier | • SAFT America, Inc. |
| • General Electric Company | • Von Roll USA, Inc. |
| • General Cable | |
| • Hubbell Incorporated | |

The issue of building code adoption is an important one. National model building codes and standards are minimum life safety standards used in the design, construction, alteration, and maintenance of building structures. They prescribe requirements which allow people to live and operate in a healthy, safe, and optimally-performing environment.

I. Building Codes Put Safety First, Protect Consumers

Rather than create and maintain their own codes, states – including Connecticut – and local jurisdictions adopt the codes and standards developed and published by a number of non-profit codes and standards organizations, including the International Code Council (ICC) and the National Fire Protection Agency (NFPA).

These model building codes are revised every three years to ensure that the requirements take into account the latest advancements in safety and technology. States remain current with the latest innovations in fire and life safety by adopting these codes every three years to coincide with the national revisions.

HB 6524 contains a provision that aims to lengthen the period for review of the most current model building codes to six years. Delaying the cycle to six years, as currently proposed, would delay the safe installation of new or improved electrical and life safety devices in addition to products, materials, and technology that achieve greater energy efficiency. NEMA believes that maintaining a timely code adoption cycle that coincides with the national model code revision cycle is the best way to ensure a common standard for safety – whether in the home, the workplace, school, places of commerce, or healthcare facilities.

II. Building Code Adoption Promotes Direct Savings for Consumers, Drives More Money into Local Economy

Insurance companies use building code adoption as a means to measure risk in a community. In fact, building inspection departments are evaluated by the Insurance Services Office (ISO) based upon use of up-to-date codes and standards. When states stay current on their code adoptions, it results in insurance rates remaining low for consumers.

Building codes protect property from fires as well as major storms and natural disasters. The codes reflect constant changes and innovations in disaster-resistant construction materials and designs – making building structures more resilient to these damaging weather events. When states stay current on code adoption, home- and business-owners are better equipped to reduce damages and loss to their property in the event of an extreme weather event.

Consumers can also save money on their energy bills through state adoption of the most current model building energy code (International Energy Conservation Code or IECC) and standard (ASHRAE 90.1). Homes and businesses constructed with the most current energy code and standard save significant dollars on energy usage. For businesses, this translates into more capital available to invest directly into the economy, hiring more employees, and even expanding business operations. To give you an idea, buildings constructed to the 2012 IECC are approximately 30% more efficient than ones constructed to the 2009 IECC. Thus, maintaining current adoption of the latest energy code is a win for consumers, a win for business, and a win for the state economy.

III. Building Code Adoption Provides Business Certainty, Supports or Creates New Jobs

NEMA member manufacturing companies design and construct their products to meet widely-adopted, consensus-based codes and standards. When states and local jurisdictions do not stay current with their code adoption, or they choose to amend the code significantly, it negatively impacts business which jeopardizes job creation and retention and Connecticut tax revenue.

Connecticut electrical manufacturers are certainly not the only business group impacted by code adoption; Connecticut distributors count on demand for products for their business operations; and Connecticut electrical contractors and inspectors attend educational seminars and obtain training materials based on the latest model codes. Connecticut can provide greater certainty for the building and construction industry by staying current with its building code adoption.

The state building codes can impact potential investment in the state. For instance, an investor wishing to build a multi-million dollar data center, may pass up Connecticut, simply because the most recent edition of the building codes permit a more efficient operating means over the operational life of the facility. The codes enable more efficient reconfiguration and reduced risk of downtime which is paramount to a data center to support businesses such as banks, manufacturing, retail and government around the world.

State adoption of the current model building codes also supports business development. Business is sensitive to operating cost. Having infrastructure that is built to the latest energy code gives those businesses an advantage to reduce their operating cost and invest in communities due to their business growth.

IV. NEMA Recommendations for Connecticut HB 6524

NEMA recommends the following changes to HB 6524:

- 1. REMOVE 6-YEAR CYCLE PROVISION; MAINTAIN EXISTING STATUTORY PROVISION OF REVIEW WITHIN EIGHTEEN MONTHS** – This provides the best solution to maintaining the safety of the public and consistency among the industry. The regulatory process in Connecticut is lengthy and complex and efficiencies in this process can and should be made. Ultimately, in order to do that, it would be best to maintain the current statutory requirement.
- 2. ADD OR SPECIFY THAT AT LEAST ONE MEMBER OF THE CODES & STANDARDS COMMITTEE REPRESENT THE ELECTRICAL MANUFACTURING INDUSTRY** – This would ensure a voice for the electrical manufacturing industry and ensure a more fair and balanced membership of the Codes & Standards Committee.

NEMA believes that inclusion of these recommendations will promote public safety, savings to consumers, and economic competitiveness and opportunity in the state of Connecticut.

V. NEMA Supports Future Improvements to Connecticut Building Code Review Process

NEMA recognizes that the building code review process in Connecticut has been inconsistent in the past. This inconsistency has led to confusion and uncertainty among the industry. We believe that Connecticut should strengthen its law to make building code review and adoption more consistent, streamlined, and timely in accordance with the publication of the most current model building codes. Our industry stands ready to lend our expertise in this area and work with Members of the Public Safety & Security Committee and the Connecticut General Assembly in the future.

Thank you for the opportunity to provide our recommendations for HB 6524 and for improving the state building code review process

Contact Information:

Deana M. Dennis
Manager, State Government Relations
National Electrical Manufacturers Association
Suite 1752
1300 N. 17th Street
Rosslyn, Va. 22209
Ph: 703-841-3244
Fax: 703-841-3344
deana.dennis@nema.org
www.nema.org